



January 23, 2020

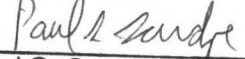
VIA ECF

Hon. Paul G. Gardephe
United States District Judge
United States Courthouse
40 Foley Square, Room 705
New York, New York 10007

MEMO ENDORSED

The Application is granted.

SO ORDERED:


Paul G. Gardephe, U.S.D.J.

Dated: Jan. 23, 2020

Re: *United States v. Rose, et al. – Shakeema Foster*
Docket No. 19-Cr-789 (PGG)

Dear Judge Gardephe:

Together with Richard Lind, I represent Shakeema Foster in the above-captioned case. She has been released on a bail package, which consists principally of a \$50,000.00 personal recognizance bond, signed by Defendant Foster and two co-signers. Her travel is presently restricted to the Southern and Eastern Districts of New York.


Ms. Foster is presently employed as a truck driver for All Natural Foods, Inc. Her job responsibilities include transporting baked items from the company's main warehouse and delivering them to various bakeries and other businesses in the New York area. I have learned from Ms. Foster that prior to her involvement in the instant case, her job previously required her to make deliveries in both Connecticut and New Jersey.

So as not to hinder her continued employment with All Natural Foods, I respectfully request a modification of Ms. Foster's bail conditions, permitting her to travel to the District of Connecticut and District of New Jersey for employment purposes only.

I have discussed this request with Ms. Foster's Pretrial Services Officer, Francesca Piperato, who has no objection. Ms. Piperato also conferred with AUSAs Louis Pellegrino and Mathew Andrews, and I have been informed by her that they have no objection.

Thank you for the Court's consideration of this request.

Respectfully submitted,


Joshua J. Horowitz

cc: All Counsel (by ECF)
Pretrial Services Officer Francesca Piperato (by email)